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July 9, 2014

**VIA ECF**

Honorable Andrew J. Peck  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, New York 10007

Re: Rio Tinto plc v. Vale S.A., et al., No. 14-cv-3042 (RMB) (AJP)

Dear Judge Peck:

We represent defendant Mahmoud Thiam in the above-referenced action. Pursuant to Local Rule 37.2, we write to join in the request filed on July 8, 2014 by defendants Benjamin Steinmetz and BSG Resources Limited (“BSGR”) (dkt. no. 56) and the request filed on July 9, 2014 by defendant Vale S.A. (“Vale”) (dkt. no. 57) for a pre-motion conference seeking leave to file a motion for a protective order staying discovery until the Court resolves defendants’ anticipated motions to dismiss.

Like Mr. Steinmetz, BSGR, and Vale, Mr. Thiam intends to move to dismiss the Complaint for failure to state a claim against him. Accordingly, and for the reasons set forth in the requests filed by Mr. Steinmetz, BSGR, and Vale, Mr. Thiam respectfully requests that this Court grant his request for a pre-motion conference seeking leave to move for a stay of all discovery. Mr. Thiam further joins in the proposed briefing schedule set forth in Vale’s request.

Respectfully submitted,

/s/

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cc: All Counsel of Record (by email)